

MTI INC.

ORIGINAL

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FHWA -98-3656-6

March, 11, 1999

Docket Clerk, US DOT Dockets

Room PL 401

400 Seventh St., S.W.

Washington, D.C. 20590-0001

RE: Petition for revisions to FMCSR Parts 390 and 396.
Docket No. FHWA -98-3656, RIN 2125-AE40.

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As a Motor Carrier professional, I have direct knowledge of the unsafe intermodal trailers being tendered to the trucking community.

These chassis and trailers are being placed on our highways in out-of-service condition. It is not until they go through a roadside inspection that these deficiencies are realized. Drivers may handle several intermodal trailers a day, of which, may only be in our possession for a few hours.

Drivers are not mechanics nor qualified to do the type of detailed inspections the DOT performs. Tractors that are in the Motor Carriers control are thoroughly inspected, repaired and maintained, however, chassis may go in and out of terminals, with different Motor Carriers, several times day and numerous times a week without any repairs or maintenance.

Laws are too often written without the understanding of "real world " circumstances. The purpose of the FMCSR is to prevent violations, not rectify them after the fact. This revision is an essential proactive approach not a reactive one.

The Trucking Community urges the FHWA to make these revisions. I am certain these changes will improve highway safety.

Thank you,



David Cannillo
Director